

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. H-18-710-S
	§	
CLARENCE ROLAND, III	§	
a.k.a. Joshua Stein	§	

MOTION FOR PROTECTIVE ORDER

COMES NOW the United States of America, by and through Patrick K. Ryan, the United States Attorney for the Southern District of Texas, and the undersigned Assistant United States Attorney, and would show the Court the following:

1. Defendant has been detained pending trial which is currently scheduled for June 24, 2019 at 9:00 am.
2. Defendant has requested access to the government's discovery to review while in custody.
3. The discovery is voluminous. There are thousands of pages of records contained on encrypted CDs and/or DVDs. Some of the records contain personal identifying information for witnesses, victims and co-conspirators, or is otherwise sensitive.
4. The United States requests that the Court enter a Protective Order prohibiting the defendant, his counsel and any other individuals employed by counsel or the Court to work on the defendant's behalf from releasing, duplicating and/or disclosing the contents of the discovery, and that the discovery disks remain encrypted to ensure the information cannot be successfully accessed by a third party not otherwise covered by the Protective Order. Except that, counsel may print from the discovery disks for preparation and litigation purposes.
5. The United States further requests that the Protective Order provide that no

recipient of this information may use it for any purpose not connected with this case or for any unlawful purpose. That any person in possession of this information who either (1) becomes aware that this information has somehow been distributed or used for an improper purpose; or (2) is requested by any third party or tribunal to produce this information will immediately inform the Court of such use, disclosure or requested disclosure.

Respectfully submitted,

RYAN K. PATRICK  
United States Attorney

By: /s/Melissa J. Annis  
Melissa J. Annis  
Assistant United States Attorney  
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Certificate of Conference

I hereby certify that I electronically provided a copy of this Motion for Protective Order to David A. Nachtigall, counsel for the Defendant Clarence Roland, III, for his review on May 21, 2019, and Mr. Nachtigall advised that he is unopposed to this motion.

/s/ Melissa J. Annis  
Melissa J. Annis  
Assistant United States Attorney

Certificate of Service

I hereby certify that a copy of the Government's Motion for Protective Order was sent electronically to David A. Nachtigall, counsel for the Defendant Clarence Roland, III, on May 21, 2019.

/s/ Melissa J. Annis  
Melissa J. Annis  
Assistant United States Attorney